

EXHIBIT 6

**REDACTED VERSION OF
DOCUMENT TO BE
SEALED**

From: Sieling, Lindsey <Lindsey.Sieling@skadden.com>
Sent: Friday, January 12, 2024 3:33 PM
To: Jordan Kane; Norm Siegel; John Yanchunis x2191; 'Patrick Barthle x2219'; Barrett Vahle; Michelle Campbell
Cc: Cimesa, Branka; Ridgway, William; Lape, Marcie; Simms, Danielle; Michelle Campbell
Subject: RE: In re Flagstar December 2021 Data Security Incident Litigation Production

[EXTERNAL]

Jordan,

Please see below for our responses to the follow-up requests related to Mr. Hardin's deposition.

Best,
Lindsey

Lindsey Sieling
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From: Jordan Kane <kane@stuevesiegel.com>
Sent: Thursday, November 30, 2023 10:59 AM
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Cc: Cimesa, Branka (CHI) <Branka.Cimesa@skadden.com>; Ridgway, William (CHI) <William.Ridgway@skadden.com>; Lape, Marcie (CHI) <Marcie.Lape@skadden.com>; Simms, Danielle (CHI) <Danielle.Simms@skadden.com>; Michelle Campbell <campbell@stuevesiegel.com>
Subject: RE: [Ext] RE: In re Flagstar December 2021 Data Security Incident Litigation Production

Lindsey,

Please let us know dates for Ms. Charters' deposition. Also, I'm following up on items discussed during Mr. Hardin's deposition. Please confirm whether Flagstar/Mr. Hardin will produce the following:

- A list of all publications Mr. Hardin has authored in the past ten years. *See* Transcript p. 80-81 (confirming that he has authored publications in the last five years, including some papers and a book chapter).
Cybersecurity: A Practical Guide to the Law of Cyber Risk, Chapter 6
Cybersecurity alert: What you need to know about ransomware
- A list of any cases in which Mr. Hardin has testified in the last four years. *See* Transcript p. 6-7, 48 (confirming Mr. Hardin provided testimony in another ransomware case).
None in the last four years.
- Information on the Shao or Yanluowang matters Mr. Hardin has worked in the past five years. *See* Transcript p. 91-94.
What information are you looking for exactly? We will not disclose the specific matters that Mr. Hardin has worked on in a non-testifying consultant capacity relating to Shao or Yanluowang or any documents related to those engagements.

- Any documents considered by Mr. Hardin that have not been produced – including the basis for the statement in paragraph 10 of his declaration that the threat actor “appeared to use ransomware associated with the Yanluowang group.” See Transcript p. 194.
The statement in paragraph 10 of Mr. Hardin’s declaration derives from facts provided by Flagstar’s counsel. There are no documents considered by Mr. Hardin in preparing his declaration that have not been produced.
- The five Flagstar posts on the CLOP shame site referenced in paragraph 24 of Mr. Hardin’s declaration. See Transcript p. 113-114 (confirming that Mr. Hardin’s staff retained copies).
Flagstar will not agree to produce this information. It is overly burdensome to produce such a large amount of data, and the data is available to Plaintiffs on CLOP’s shame site.
- Yanluowang’s internal chat logs. See, e.g., Transcript p. 90, 183-185, 201 (confirming that Mr. Hardin has retained copies of these chats and bases certain opinions on them).
Yanluowang’s internal chat logs are available at the following site:
https://github.com/arb0urr/yanluowang_leaks.
- Summaries CRA prepared that capture the results of CRA’s “person of interest” analysis for each individual searched. See Transcript p. 223.
The summary of CRA’s analysis of John Scott Smith is contained in Mr. Hardin’s declaration. Mr. Hardin has not offered any opinions on any other persons of interests, and therefore CRA’s analysis of the three other individuals (who are no longer named plaintiffs) is not relevant to jurisdictional discovery.
- A list of search terms CRA used to search the marketplaces in Dec. Ex. B. See Transcript, p. 101-104.

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- The name of the “internet research project” CRA relied on to analyze the Shaoleaks site in Dec. Ex. C. See Transcript, p. 276-277.
<https://ransomwatch.telemetry.ltd/#/README>
- Any communications with “various individuals” or “handles” in the marketplaces searched by CRA as part of its Flagstar Analysis (Dec. Ex. B). See Transcript p. 108-109.
Any communications with “individuals” or “handles” in the marketplaces were done on the respective forums, which are not retained.
- Any teaching materials Mr. Hardin has retained from his cyber risk management course at DePaul. See Transcript p. 80.
Mr. Hardin has not taught at DePaul in over four years. He did not rely on any of his teaching materials in forming the opinions in his declaration. These materials will not be produced.
- Any additional engagement letters between Flagstar and CRA related to this engagement. See Transcript p. 24-25.
There are no other engagement letters between Flagstar and CRA related to this engagement.
- Documents for Mr. Hardin’s/CRA’s other engagements with Flagstar, including statements of work, engagement letters, and invoices. See Transcript p. 243-247.
There are no prior engagements with Flagstar.

Thanks,

Jordan

Jordan A. Kane

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